

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: STEVEN HOLLENHEAD
DEBTOR(S)**

**CASE NO. 13-13089
CHAPTER 13**

MOTION TO AVOID A JUDGMENT LIEN

COMES NOW the Debtor named above and files his Motion to Avoid a Judgment Lien, showing the court as follows:

That prior to filing his Chapter 13 Bankruptcy, the Creditor, **NU-WAY CASH AND CARRY**, obtained a judgment against the Debtor. The Creditor had filed said judgment in the judgment rolls of the Debtor's resident county, that being **Webster County (2012-38-CVM)**. That the judgment impairs an exemption that the Debtor would be otherwise be entitled to, under § 85-3-21, Miss. Code Ann. Therefore, Debtor respectfully request that the Court receives, and docket the Motion and that upon hearing the court issue an Order Avoiding the Judgment Lien of **NU-WAY CASH AND CARRY**, against the Debtor, such other and further relief as the court deems just and proper under the circumstances.

Respectfully submitted,
STEVEN HOLLENHEAD

/s/ William C. Cunningham
William C. Cunningham

Prepared By:
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CERTIFICATE OF SERVICE

I, William C. Cunningham, Attorney for the Debtor, do hereby certify that I have this day mailed and/or electronically filed a true and correct copy the foregoing **Motion To Avoid Judgment Lien**, by United States Postal Service, postage prepaid, or by electronic filing through the ECF System to:

Terre M. Vardaman, Chapter 13 Trustee
Vardaman13@gmail.com

Office of the U.S. Trustee
USTPRegion.05.AB.ECF@usdoj.gov

NU-WAY CASH AND CARRY – P.O. BOX 733, EUPORA, MS 39744

SO CERTIFIED: July 30, 2013

/s/William C. Cunningham
William C. Cunningham
Attorney at Law

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